



WRITER'S DIRECT CONTACT:

KATHRYN L. KNOWLTON

(414) 202-2444

KATE@KNOWLTONLAWGROUP.COM

September 28, 2022

Honorable Magistrate Judge Nancy Joseph
United States District Court, Eastern District of Wisconsin
517 East Wisconsin Avenue
Milwaukee, Wisconsin 53202

VIA EFILE

RE: US District Court for the Eastern District of Wisconsin
Case No: 2-20-CV-01660
Knowlton, et al v. City of Wauwatosa, et al.

Dear Your Honor:

We write pursuant to your Updated Scheduling Order of September 16, 2022 (ECF #200), wherein you ordered in paragraph 4:

Regarding the “Protestor List” and the Dropbox hyperlink, the Plaintiffs are ordered to draft a proposed written stipulation, articulating with specificity the actions the Plaintiffs are requesting that the Defendants take as to these items. The Plaintiffs must submit the draft proposal to the Defendants, who may then either agree to the proposal or propose modifications. After the parties have reached a stipulation, the parties will submit the stipulation for the Court’s approval no later than September 28, 2022.

On September 18, 2022, I emailed a proposed stipulation per above. On September 19, 2022, Attorney Zellner rejected the proposal without proposing any modifications, and within a half hour of receiving the rejection, I emailed again asking specifically for substantive concerns that could be amended and requested any/all suggested changes, including an invitation to write a new proposal entirely.

I received no response at all.

On September 26, 2022, Attorney Motley emailed a renewed inquiry, re-forwarded a draft proposed order, and provided specific rationale for Plaintiffs’ proposal language, as had been

September 28, 2022

Page 2 of 2

previously discussed. Attorney Zellner simply replied, "As I previously responded, I am not stipulating to a temporary restraining order." And nothing else.

On September 27, 2022, pursuant to the Updated Scheduling Order, in good faith and fully supportive of the spirit of paragraph 9, I telephoned directly to Attorney Zellner to make further attempts to obtain a stipulated proposed order. Unfortunately, no additions or changes were proposed by Attorney Zellner, despite my requests and offers to make changes. Attorney Zellner then explicitly stated that I should correspond directly with the Court in this regard.

Thus, with strict respect for your order and in the interest of full compliance, I file contemporaneous with this letter, a proposed order on behalf of the Plaintiffs, modified with as much of what I could glean were important considerations expressed by Attorney Zellner, and regrettably also fully acknowledging that no stipulation was successful.

If anything further is required, please advise and we will comply without delay. Thank you.

Very truly yours,

KNOWLTON LAW GROUP, LLC

Kate Knowlton
Kathryn L. Knowlton